



# Knuckles Komosinski & Manfro LLP

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## Partners

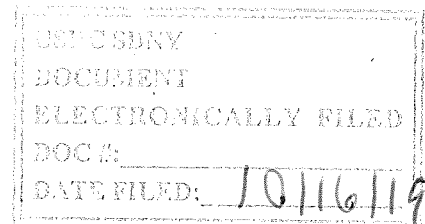
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October 15, 2019

### Via Electronic Filing

United States District Court, Southern District of New York  
Chambers of Judge Vincent L. Briccetti  
300 Quarropas Street, Room 630  
White Plains, New York 10601



**Re: Jonathan Kuhl v. U.S. Bank Trust National Association, et al.**  
**Case No. 19-cv-8403-VB**

Dear Chambers,


Please be advised that this office has been retained to represent the Defendant, Rushmore Loan Management Services LLC, in the above-captioned matter. This letter is sent to request an extension of time for Rushmore to file a motion to dismiss the instant complaint, or in the alternative, to answer same should this Court deny said motion.

Upon information and belief, Rushmore was served with a complaint in the instant action on September 24, 2019. Thus, the time for Rushmore to respond to same expires October 15, 2019.

Based upon the allegations contained in the Plaintiff's complaint, Rushmore serviced the subject loan held by MTGLQ Investors, LP.

Due to the relationship with both servicer and investor, a thorough review must be completed by this firm to determine whether representation presents a conflict of interest for the firm. Accordingly, Rushmore hereby requests an extension of time to move to dismiss the Plaintiff's complaint, or in the alternative to provide a response to same, for an additional 21 (twenty-one) days.

There have been no other requests made for this or similar relief on behalf of Rushmore. Further, Plaintiff's consent to the within-requested relief has not been sought, as Plaintiff has neither

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provided a telephone number or e-mail address on this case docket, and therefore could not be reached prior to the filing of the instant request.

Thank you in advance for the courtesy of granting the instant request, and please feel free to contact the undersigned should further information be deemed necessary.

Respectfully,

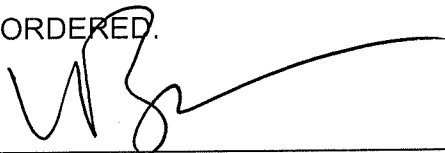
/s/ Érina Fitzgerald  
Érina Fitzgerald

cc: Jonathan Kuhl  
115 South Quaker Lane  
Hyde Park, NY 12538



APPLICATION GRANTED. Rushmore's time to answer, move, or otherwise respond to the complaint is extended to 11/15/2019. In addition, plaintiff's time to respond to MTGLQ's pending motion to dismiss (Doc. #12) is STAYED. Plaintiff shall not respond to MTGLQ's motion to dismiss until further Court Order. Clerk shall (i) terminate the letter-motion (Doc. #15) and (ii) mail a copy of this Order to plaintiff at the address on the docket.

SO ORDERED.



Vincent L. Briccetti, U.S.D.J., 10/16/2019

